

September 18, 2014

Delivered via electronic mail

Ms. Brenda South
USEPA REGION 8
1595 Wynkoop St.
Mail Code: 8P-R
Denver, CO 80202-1129

Re: request for additional information

Dear Ms. South,

This letter is in response to your request for additional information regarding the PCB contamination event that occurred at our facility in Salt Lake City, Utah on August 26th, 2014. In your email request, you asked Thermo Fluids to provide “...written description of how oil contamination occurred and where oil was moved, including amounts, dates, tank identification, truck and tank transfers, test results) to consider your request to use 9400 gallons of solvent for tank decontamination “.

I have included the information you have requested below. Analytical results from our third party laboratory will follow under separate cover.

On August 20th, 350 gallons of oil was picked up from JBT Aerotech in Ogden Utah by Thermo Fluids. The material was conveyed to Thermo Fluids truck via vacuum to truck number OCT-123, a collection truck with a capacity of 5,100 gallons.

Mountain States Region

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Pima Center Pkwy, #105
Salt Lake City, UT 84104

801.433.1114 Main

801.433.1120 Fax

**Northwest Region
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Initial testing prior to pumping out JBT's tank was completed to determine halogen content using a Dexsil Q4000 test kit. That analysis showed 400 ppm halogens. This is less than the 1,000 ppm limit of acceptance and the material was loaded into the truck. Throughout the day, additional customers were serviced in a similar manner at each stop filling the collection truck to a final volume of 5,010 gallons. Test results of other generators material picked up on the 20th also consisted of Dexsil Q4000 halogen tests, which all were below the 1,000 ppm halogen acceptance limit.

The oil collected on August 20th by OCT 123 was pumped into tank number DT-20, containing approximately 9,040 gallons that same day. Pre-off load analysis includes an additional halogen test which, again was under 1,000 ppm for halogens. A truck retain sample was pulled and kept for reference per Thermo Fluids procedure. Tank DT-20 was locked down for analytical clearance and a sample sent to our third party laboratory.

Between August 20th and August 25th, oil collection truck OCT-123 made additional service collections and transferred those loads into tanks DT-17 (8/21/14) and DT-18 (8/22 and 8/25/14).

On Monday morning, August 25, 2014, Tanks DT-17 and DT-20 were transferred to tank RFO-26 which contained approximately 50,000 gallons of oil.

The PCB contamination was discovered the morning of August 26th, 2014 through our own internal screening processes. An analysis of the tank contents for PCB's are shown in the table below. Tank DT-18 was subsequently transferred to RFO-26 on August 27th in preparation for the ensuing decontamination activity.

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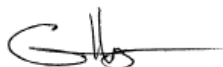
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Tank ID	Tank Capacity	Current tank volume	PCB concentration
DT-17	19905	Empty at 889	BRL
DT-18	19905	Empty at 889	BRL
DT-20	19905	Empty at 889	21.92
RFO-26	259095	93709	BRL

Please let me know if you need any additional information.

Respectfully,



Greg Hedger
Corporate Director – EHS
Thermo Fluids, Inc.

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